Exhibit "D"

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

ALYSSA CORMIER,	§	
CLAIRE BRUDNER,	§	
MARIANNA ACOSTA,	§	
and ESTY PITTMAN,	§	
Plaintiffs,	§	
	§	
v.	§	CIVIL ACTION NO. 1:23-cv-647-RP
	§	
SCRIBE MEDIA, LLC,	§	
BOND FINANCIAL TECHNOLOGIES	§	JURY TRIAL DEMANDED
HOLDINGS, LLC,	§	
ENDURING VENTURES, INC.,	§	
ENDURING CONSULTING GROUP	§	
LLC, and	§	
ENDURING VENTURES TY	§	
PARTNERSHIP LLC,	§	
Defendants.	§	

DECLARATION OF ESTY PITTMAN

- I, Esty Pittman, declare as follows:
- 1. I submit this declaration in support of Plaintiffs' Motion for Class Certification. I reside in Tulsa County, Oklahoma and am over the age of 21. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to them. I understand that Plaintiffs will use this declaration in connection with filing for class action certification in that lawsuit.
- 2. I was hired to work at Scribe Media, LLC ("Scribe") as a Relationship Manger on approximately October 25, 2021. At the time I was laid off from Scribe, I worked as an Author Experience Coach.
- 3. On May 24, 2023, Scribe notified me and approximately 90 other Scribe employees that we were being terminated immediately.

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4. My attorneys have discussed with myself and the other Plaintiffs the potential advantages

and disadvantages of proceeding in a class action rather than individually. After those discussions,

the other Plaintiffs and I decided that it was best to proceed with a class action instead of individual

lawsuits against the Defendants.

5. I am thankful that the other workers have come forward to hold those who ran "old Scribe"

and those who are running "new Scribe" accountable for what they did to us. I further support

approval of this class certification because I do not have the resources to file a case individually

on my own behalf.

6. I do not have any additional claims beyond the violations of the WARN Act, and I do not

presently or potentially have any claims in conflict with any members of this class.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and

correct.

Executed on: 04/25/2024

Esty Pittman